

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 25-cr-20224

v.

JUDGE: Nancy G. Edmunds

Sarmad RAFI,

Defendant.

**STIPULATION ADJOURNING THE PLEA CUTOFF, FINAL PRETRIAL
CONFERENCE, AND TRIAL DATE**

The United States of America and the defendant, Sarmad RAFI, by and through his respective counsel, hereby stipulate and jointly move the Court to enter the attached order qualifying the time from May 13, 2025 to the trial date of August 12, 2025 as excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7). This extension is necessary to allow defense counsel sufficient time to review discovery, consult with the defendant, and for the parties to negotiate any potential alternate resolutions of the case. If no resolution is reached, the parties jointly request that the Court adjourn the trial to allow both sides adequate time to complete their trial preparations. Proper trial preparation, which includes obtaining and evaluating all information bearing on the defendant's decision to plead guilty or proceed to trial, is necessary to provide constitutionally adequate representation. The parties further

stipulate and jointly move for the Court to conclude that the time period shall constitute excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by the granting of this request outweigh the best interests of the public and the defendant in a speedy trial. The parties' reasons for this request and for a finding of excludable delay are as follows:

- Failure to grant this continuance would unreasonably deny counsel for the defendant and the attorney for the government the reasonable time necessary for effective preparation for trial or negotiation of any potential alternate resolutions in this case, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties therefore request that the Court find that the ends of justice served by the granting of the parties' request outweigh the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

s/ Kathryn Boyles

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Date: May 14, 2025

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
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UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 25-cr-20224

v.

JUDGE: Nancy G. Edmunds

Sarmad RAFI,

Defendant.

**ORDER ADJOURNING DATES AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT**

The Court has considered the parties' stipulation and joint motion qualifying the time from May 13, 2025 to the trial date of August 12, 2025 as excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7). For the reasons described in the parties' submission, and after considering the factors listed in § 3161(h)(7)(B), the Court finds that the ends of justice served by granting the parties' requested continuance outweigh the best interests of the public and the defendant in a speedy trial. It further finds that the time from May 13, 2025, to the new trial date qualifies as excludable delay under § 3161(h)(7).

IT IS SO ORDERED that the dates in the matter are reset as follows:

The final pretrial conference is set for: July 14, 2025;

The jury trial is set for: August 12, 2025.

IT IS FURTHER ORDERED the time between May 13, 2025, and the new trial date of August 12, 2025, is excludable pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. 3161(h)(7) because considering the factors in 18 U.S.C. § 3161(h)(7)(B) along with the parties' stipulation that the adjournment will provide additional time to allow for efficient preparation and negotiation of any potential alternate resolutions of this case, the Court finds that the ends of justice is served by this delay outweigh the best interest of the defendant and the public in a speedy trial.

IT IS SO ORDERED.

s/Nancy G. Edmunds
HONORABLE NANCY G. EDMUNDS
United States District Judge

Dated: May 15, 2025